

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

YUICHIRO MIYATA and SYRINTHIA  
MIYATA, and the marital community  
comprised thereof,

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC., an Ohio Corporation, MOUNTAIN  
RUN SOLUTIONS, LLC, a/k/a and d/b/a  
PERFECTION COLLECTION, LLC, a Utah  
Limited Liability Company, licensed pursuant  
to Utah Entity Number 7798588-0130, and  
doing business in Washington State, pursuant  
to UBI No. 604 206 438, ZIONS DEBT  
HOLDINGS, LLC, a Delaware Limited  
Liability Company, an individual and  
“member” of MOUNTAIN RUN  
SOLUTIONS, LLC, a/k/a and d/b/a  
PERFECTION COLLECTION, LLC, and  
CHRISTOPHER CARTER, an individual and  
“member” of MOUNTAIN RUN  
SOLUTIONS, LLC, a/k/a and d/b/a  
PERFECTION COLLECTION, LLC, and  
BRIAN FULLER, an individual and  
“member” of MOUNTAIN RUN  
SOLUTIONS, LLC, a/k/a and d/b/a  
PERFECTION COLLECTION, LLC,

Defendants.

NO. 3:20-cv-05519-RAJ

**FRCP 41(a) NOTICE OF DISMISSAL  
WITHOUT PREJUDICE AS TO  
DEFENDANT ZIONS DEBT  
HOLDINGS, LLC**

DISMISSAL OF DEFENDANT ZIONS  
3:20-cv-05519-RAJ

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**I. NOTICE**

Plaintiffs, YUICHIRO MIYATA and SYRINTHIA MIYATA, by and through the undersigned counsel, Robert Mitchell, hereby DISMISS WITHOUT PREJUDICE their claims against Defendant, ZIONS DEBT HOLDINGS, LLC, and state as follows:

1. Defendant, ZIONS DEBT HOLDINGS, LLC has not been served with a copy of the summons and complaint;
2. Defendant, ZIONS DEBT HOLDINGS, LLC has not asserted any claims or counterclaims; and
3. Dismissal without prejudice is appropriate, pursuant to Fed. R. Civ. P. 41(a).

Presented by:

*S/Robert Mitchell*

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*Counsel for Plaintiffs, YUICHIRO MIYATA and SYRINTHIA MIYATA*

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury under the laws of the State of Washington that on the 21<sup>st</sup> day of October, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

EXPERIAN INFORMATION SOLUTIONS, INC., through its attorney, Angela Taylor, and Rachel Groshong, at: angelataylor@jonesday.com; rachel.groshong@stoel.com; SEA\_PS@stoel.com; cindy.castro@stoel.com; docketclerk@stoel.com

Dated this 21<sup>st</sup> day of October, 2020, at Memphis, Tennessee.

S//Robert W. Mitchell

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*Attorney for Plaintiffs*